

### **Remarks**

In response to the Office Action mailed June 14, 2004, Applicants sincerely request reconsideration in view of the above claim amendments and the following remarks. The claims as presented are believed to be in allowable condition.

In the above-referenced claim amendments, claims 1, 10, and 19 have been amended, new claim 24-28 has been added, and claims 9 and 23 have been canceled. Claims 1 has been amended to clarify that the string of text is received after it has been entered into the electronic document and to clarify that the plurality of labels determined by the recognizer plug-ins are based at least on the context of the string of text. Claim 10 has been amended to clarify that the step of determining is based at least on the context of the string of text in the electronic document. Claim 19 has been amended to clarify that the recognizer plug-in determines a label based at least on the context of the string in the electronic document. Support for these amendments may be found on page 12, lines 14-20 and on page 28, lines 26-30 in the Specification. New claim 24 includes features recited in previously canceled claim 4. New claims 25-27 include features recited in previously canceled claims 20 and 22. New claim 28 includes features recited in currently pending claims 1 and 3. No new matter has been added.

Claims 1-3, 5-19, 21, and 23 are currently pending in the application. Claims 1-3, 5-19, 21, and 23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Beauregard et al. (U.S. Patent 5,974,413, hereinafter "Beauregard") in view of Bays et al. (U.S. Patent 6,519,603, hereinafter "Bays"). As a point of clarification for the record, Applicants incorrectly noted that the Office Action of December 29, 2003 did not include a specific rejection of dependent claim 22 when, in fact, the Office Action did indeed

contain such a rejection. However, Applicants' cancellation of claim 22 in the response to the Office Action filed on April 6, 2004 sufficiently addressed this rejection.

### **Applicants' Substance of the Interview**

A telephonic interview between the Examiner and Applicants' representative was held on June 28, 2004 to discuss claim 1 in view of U.S. Patent 5,974,413 ("Beauregard") and U.S. Patent 6,519,603 ("Bays"). Applicants further adopt the contents of the Examiner's Interview Summary (Paper No. 11) mailed on July 1, 2004 and assert that the preceding statement and the Interview Summary (along with the Substance of Interview contained therein), is a complete and proper recitation of the substance of the interview.

### **Claim Rejections—35 U.S.C. § 103**

Claims 1-3, 5-19, 21, and 23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Beauregard in view of Bays. This rejection is respectfully traversed.

As previously discussed in Applicants' response of April 6, 2004, Beauregard discloses a semantic user interface (SUI) from which a user is enabled to enter "action words" to control the operations of a computer. An action word may be either a single word or a phrase that includes two or more words. In the SUI, each action word is compared against the contents of a wordbase. The wordbase includes a plurality of item records. Each item record includes an action word and an associated service script for performing various actions such as issuing a command to launch an application. If the action word is located in the wordbase, the service script associated with the action word is executed. See Col. 5, lines 12-52. The SUI of Beauregard detects the keystrokes, which may make up action words, as they are being entered (emphasis supplied). If the keystrokes correspond to an action word, the service script associated with the action

word is retrieved. The system then erases the action word from the user's input text before executing the related service script. See Fig. 7 and Col. 36, lines 2-25.

Amended independent claim 1 specifies a method for semantically labeling a string of text in an electronic document created in an application program module. The method includes receiving a string of text in a recognizer dynamic-link library after the entire string of text has been entered in the electronic document, annotating the string of text to determine a plurality of labels, and transmitting the plurality of labels to the application program module. The plurality of labels is determined based on at least on the context of the string of text in the electronic document.

Beauregard fails to disclose a method which teaches, discloses, or suggests receiving a string of text in a recognized dynamic-link library after the entire string of text has been entered in an electronic document and determining a plurality of labels based at least on the context of the string of text in the electronic document, as recited in amended independent claim 1. As noted above, Beauregard teaches receiving keystrokes as they are being entered by a user. Keystrokes corresponding to action words result in the retrieval of a service script and the action words are erased from the system prior to the executing the script. Since the system of Beauregard retrieves the script upon recognizing an action word and then erases the action word prior to executing the script, it is evident that the context of surrounding words, for example, is not addressed in the actions of retrieving and executing service scripts. Thus, it is respectfully submitted that Beauregard fails to teach this feature.

Bays, relied upon in the Office Action to cure the deficiencies of Beauregard, discloses a method for entering and annotating data indexed items in database material

(Col. 2, lines 10-18). As discussed in Applicants' response of April 6, 2004, Bays teaches that annotations may be used to capture information such as additional facts about database material (e.g., text strings), the opinions and judgments of experts about the database material, and/or links to other related material. See Col. 2, lines 38-61. Bays, however, fails to teach, disclose, or suggest receiving a string of text in a recognized dynamic-link library after the entire string of text has been entered in an electronic document and determining a plurality of labels based at least on the context of the string of text in the electronic document, as recited in amended independent claim 1.

Since neither Beauregard nor Bays, alone or in combination, teaches, discloses, or suggests the aforementioned features of specified in amended independent claim 1, it is respectfully submitted that this claim is allowable and the rejection under 35 U.S.C. § 103(a) should be withdrawn for at least the aforementioned reasons. Dependent claims 2-3 and 5-8 each depend from amended independent claim 1 and thus specify at least the same features as amended independent claim 1. Therefore, dependent claims 2-3 and 5-8 are also allowable for at least the reasons given above and the rejections of these claims under 35 U.S.C. § 103(a) should also be withdrawn.

Amended independent claims 10 and 19 specify similar features as amended independent claim 1. Specifically, claims 10 and 19 specify determining labels based at least on the context of the string of text (or string) in the electronic document. As discussed above with respect to amended independent claim 1, neither Beauregard nor Bays, alone or in combination, teaches, discloses, or suggests the aforementioned features. Therefore, amended independent claims 10 and 19 are allowable and the rejections of these claims under 35 U.S.C. § 103(a) should be withdrawn.

Dependent claims 11-18 depend from amended independent claim 10 and thus specify at least the same features. Similarly, dependent claim 21 depends from amended independent claim 19 thus specifies at least the same features. Therefore, dependent claims 11-18 and 21 are also allowable for the reasons given above and the rejections of these claims under 35 U.S.C. § 103(a) should also be withdrawn.

#### **New Claims**

New claim 24 depends from amended independent claim 1 and thus specifies at least the same features. New claims 25-26 depend from amended independent claim 19 and thus specify at least the same features. Independent claims 1 and 19 are allowable over the Beauregard and Bays references presently cited in the Office Action for the reasons given above. Thus, dependent claims 24 and 25-26 are also allowable over these references for at least the same reasons. New claims 27-28 include the features specified in amended independent claim 1 and dependent claim 3. Claims 1 and 3 are allowable over the Beauregard and Bays references presently cited in the Office Action for the reasons given above. Thus, claims 27-28 are also allowable over these references for at least the same reasons.


### Conclusion

In view of the foregoing amendments and remarks, this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is invited to call the Applicants' attorney at the number listed below.

Respectfully submitted,

MERCHANT & GOULD

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